

**Verizon New England Inc.  
d/b/a Verizon Massachusetts**

**Commonwealth of Massachusetts**

**Docket No. 03-60**

**Respondent:** John Conroy / John White  
**Title:** Vice President / Exec. Director

**REQUEST:** Conversent Communications of Massachusetts, LLC

**DATED:** January 22, 2004

**ITEM:** Conversent 8-1 Please identify all of the central offices in Massachusetts (by name and CLLI code) in which NEON has a collocation arrangement. Please identify the type of collocation.

**REPLY:** Verizon MA objects to this request on the grounds that the question is overly broad, asks for information that is not relevant to the triggers analyses at issue in this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding its objection, Verizon MA responds as follows. Please see the proprietary version of Attachment 3, which was attached to the Supplemental Panel Testimony of Verizon MA filed on December 19, 2003. Attachment 3 lists the wire centers where Verizon MA meets one or more of the FCC's transport triggers and for each such wire center identifies the relevant carriers that have non-Verizon provided transport facilities terminated in a CATT or collocation arrangement.

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**Respondent:** John Conroy / John White  
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**REQUEST:** Conversent Communications of Massachusetts, LLC

**DATED:** January 22, 2004

**ITEM:** Conversent 8-2 Please identify all of the central offices in Massachusetts (by name and CLLI code) in which NSTAR has a collocation arrangement. Please identify the type of collocation.

**REPLY:** Verizon MA objects to this request on the grounds that the question is overly broad, asks for information that is not relevant to the triggers analyses at issue in this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding its objection, Verizon MA responds as follows. Please see the proprietary version of Attachment 3, which was attached to the Supplemental Panel Testimony of Verizon MA filed on December 19, 2003. Attachment 3 lists the wire centers where Verizon MA meets one or more of the FCC's transport triggers and for each such wire center identifies the relevant carriers that have non-Verizon provided transport facilities terminated in a CATT or collocation arrangement.

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**ITEM:** Conversent 8-3 Please identify all of the central offices in Massachusetts (by name and CLLI code) in which Metromedia Fiber has a collocation arrangement. Please identify the type of collocation.

**REPLY:** Verizon MA objects to this request on the grounds that the question is overly broad, asks for information that is not relevant to the triggers analyses at issue in this proceeding, and is not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding its objection, Verizon MA responds as follows. Please see the proprietary version of Attachment 3, which was attached to the Supplemental Panel Testimony of Verizon MA filed on December 19, 2003. Attachment 3 lists the wire centers where Verizon MA meets one or more of the FCC's transport triggers and for each such wire center identifies the relevant carriers that have non-Verizon provided transport facilities terminated in a CATT or collocation arrangement.

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